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5 *Attorneys for Defendant,*  
**PROGRESSIVE DIRECT INSURANCE**

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 SEAN ANTHONY GARCIA; MARIA  
10 JOANNE CRUZ,

11 Plaintiff,

12 vs.

13 PROGRESSIVE DIRECT INSURANCE  
COMPANY; and DOES 1 – 20, inclusive,

14 Defendants.

CASE NO. 2:15-cv-02264-JCM-PAL

**STIPULATION AND ORDER FOR  
DISMISSAL WITH PREJUDICE**

15 IT IS HEREBY STIPULATED by and between KRISTOPHER M. HELMICK, ESQ., of the  
16 RICHARD HARRIS LAW FIRM, attorneys for Plaintiffs, SEAN ANTHONY GARCIA and MARIA  
17 JOANNE CRUZ, and RYAN L. DENNETT, ESQ., of the law firm of DENNETT WINSPEAR, LLP,  
18 attorneys for Defendant, PROGRESSIVE DIRECT INSURANCE COMPANY, that the within  
19 matter be dismissed, with prejudice, each party to bear their own attorneys' fees and costs.

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IT IS FURTHER STIPULATED that Defendant's "Emergency Motion" to Compel

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Arbitration filed on February 12, 2016 [Doc #11] is moot, as the parties have agreed to dismiss

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this matter and proceed to binding arbitration through a private arbitrator.

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DATED:

3/21/16

DATED:

11 March 2016

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RICHARD HARRIS LAW FIRM

DENNETT WINSPEAR, LLP

6

By

KRISTOPHER M. HELMICK, ESQ.

By

RYAN L. DENNETT, ESQ.

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Attorneys for Plaintiffs,

Attorneys for Defendant

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Sean Anthony Garcia

Progressive Direct Insurance Company

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Marie Joanne Cruz

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ORDER

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UPON STIPULATION of counsel and good cause appearing,

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IT IS SO ORDERED.

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DATED: March 23, 2016

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Submitted by:

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DENNETT WINSPEAR, LLP

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By

RYAN L. DENNETT, ESQ.

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